UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

May 31, 2005

Curtis Frye
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Soil Pre-Design Investigation Report Old Fire Fighting Training Area

Dear Mr. Frye:

EPA reviewed the *Soil Pre-Design Investigation Report* for the Old Fire Fighting Training Area, Naval Station Newport, Newport, RI dated April 2005 in light of its completeness, technical accuracy, consistency and for incorporation of EPA's earlier comments. Detailed comments are provided in Attachment A.

Some of the language used and data interpretation in the report when describing the nature and extent of contamination is not as meticulous as it could be, which creates implications regarding contaminant conditions with which EPA does not agree. However, in the interests of completing the Pre-Design Investigation (PDI) Report and moving on to the remedial phase, EPA accepts the findings of the investigation with the understanding that the details of the removal action will be resolved during development of the Removal Action Work Plan. To be clear, the data generated for the PDI Report will be used to guide the development of the Removal Action Work Plan but acceptance of the PDI Report creates no commitments regarding data interpretation or the details to be required in the Removal Action Work Plan.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighting Training Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI

Cornelia Mueller, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA

ATTACHMENT A

Page	Comment
p. 5-1,,§5.1.1	The meaning of the first sentence in the second paragraph is not clear. The sentence appears to discuss the depth of PAH contamination; however, the low elevation presented (2.5 feet) is the bottom of the fill, not the lower extent of PAH contamination found at SB416.
p. 5-4, §5.3.1	Table 4-1 lists the various explorations conducted at the Site and the analytical parameters evaluated for each. However, no listing is provided for dioxin analyses. The report text states on page 5-5, Section 5.3.1 that dioxin was not considered a contaminant of concern for the PDI because, while it was detected, it did not exceed the guidance PRG value. Please note that dioxin will need to be evaluated in the post-excavation relative risk assessment (using both slope factors).
Table 5-3	The base grade elevations presented in this table (and in Tables 4-1 and 5-2) are not consistent with the elevations shown in grey (topography after mound removal) in Figures 4-6, 4-7, and 4-8. It appears that the regarding contours shown in the figures should only be applied within the boundaries of the mounds. The yellow shading for the "fill" column appears to be inconsistently applied. Please clarify the criterion used for shading. It appears that the calculations in this table do not properly account for the removal of fill located above the water table. The Navy has indicated that all fill above the water table would be removed (*see also* Page 5-8, Section 5.3.2 of the PDI Report). While this apparent inconsistency appears in a number of the calculations, it apparently only impacts the excavation volume for cells C3 and A-7 (Area 6). In cell C9, boring B2 had visible oily staining at a depth of 6-8 feet below ground surface (bgs) according to the boring log; however, no samples were collected at this depth. Consequently, the excavation in this area will need to be deep enough to remove this contamination. SB430 is more indicative of the potential depth of contamination in cell A10 than TP14. This table relies only on TP14 that terminated at 4.5 feet bgs, at which point oily contamination was observed according to the test pit log. The excavation depth required for this cell will need to be deeper.
Appendix E	The page numbering for Tables E-1 through E-3 is not consistent with the table numbering. It appears that some of the data could be missing.